Case 6:09-cr-00033-C-BG	Document 1 - Fil	ed.08/12/09	Page 1 of	14 PageID 1	~
			U. NORTH	S. DISTRICT COU ERN DISTRICT OF	RT F TEXAS
IN THE U	NITED STATE	S DISTRICT	COURT r	FILED	46.75.1
	NORTHERN D SAN ANGELO		TEXAS	AUG 2 2009	
UNITED STATES OF AMERI	ICA §		CLER!	C, U.S. DISTRICT C	OURT
v.	§ §	No	A STATE OF THE STA	The second secon	0
WILLIAM ADAIR(1)	§ §				
LISA SMITH (2)	§				
JAMIE KING (3)	\$				
CLINTON JOHNSON (4)	8				

INDICTMENT

The Grand Jury Charges:

Count One Conspiracy to Make, Possess, and Utter Forged Securities (Violation of 18 U.S.C. § 371)

From on or about a date unknown to the grand jury, and continuing through in or about April 2009, in the San Angelo Division of the Northern District of Texas, and elsewhere, William Adair, Lisa Smith, Jamie King, and Clinton Johnson, defendants, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other and with persons unknown to the grand jury to commit offenses against the United States, that is, to manufacture, possess, and utter counterfeit securities of an organization, with the intent to deceive another person and organization in violation of Title 18, United States Code, Section 513(a).

MANNER AND MEANS

It was part of this conspiracy that one or more of the conspirators would and did:

- Make counterfeit securities of an organization; 1.
- 2. Possess counterfeit securities of an organization; and
- Utter counterfeit securities of an organization. 3.

OVERT ACTS

In furtherance of this conspiracy and to effect the objects thereof, the conspirators committed, among others, the following overt acts in the Northern District of Texas and elsewhere:

Substantive counts two through thirty-eight of this indictment are hereby 1. incorporated as overt acts of this conspiracy and of this count one.

All in violation of Title 18, United States Code, Section 371.

Counts Two through Twenty-One Uttering Forged and Counterfeited Securities (Violation of 18 U.S.C. § 513(a))

Beginning on or about the dates set forth below, in the San Angelo Division of the Northern District of Texas, and elsewhere, William Adair, Lisa Smith, Jamie King, and Clinton Johnson, defendants, did make, possess, and utter, forged and counterfeited securities of an organization, as that term is defined in Title 18, United States Code, Section 513(c)(4), with the intent to deceive another person and organization:

Count No.	Date of Offense	Name of Drawer	Name of Financial Institution	Amount of Check
2	3/23/09	A Landscape Solution	Crocket National Bank	\$912.00
3	3/23/09	A Landscape Solution	Crocket National Bank	\$1,219.51
4	4/01/09	Abbott's Supermarket	San Angelo National Bank	\$395.32
5	4/01/09	Abbott's Supermarket	San Angelo National Bank	\$835.76
6	4/01/09	Abbott's Supermarket	San Angelo National Bank	\$300.00
7	3/31/09	C & H Transmission	Wells Fargo	\$621.89
8	3/31/09	C & H Transmission	Wells Fargo	\$621.89
9	3/31/09	C & H Transmission	Wells Fargo	\$621.89

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Count No.	Date of Offense	Name of Drawer	Name of Financial Institution	Amount of Check
10	4/01/09	C & H Transmission	Wells Fargo	\$689.45
11	3/31/09	C & H Transmission	Wells Fargo	\$300.00
12	3/31/09	C & H Transmission	Wells Fargo	\$300.00
13	3/31/09	C & H Transmission	Wells Fargo	\$300.00
14	3/31/09	C & H Transmission	Wells Fargo	\$300.00
15	3/31/09	C & H Transmission	Wells Fargo	\$882.31
16	3/31/09	C & H Transmission	Wells Fargo	\$963.49
17	3/31/09	C & H Transmission	Wells Fargo	\$812.54
18	4/01/09	C & H Transmission	Wells Fargo	\$963.69
19	4/01/09	C & H Transmission	Wells Fargo	\$963.89
20	3/31/09	Cook Construction	1 st Bank & Trust	\$400.00
21	3/31/09	Cook Construction	1 st Bank & Trust	\$400.00

Each count being a violation of Title 18, United States Code, Sections 513(a) and 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

Counts Twenty-Two through Thirty-Nine Uttering Forged and Counterfeited Securities (Violation of 18 U.S.C. § 513(a))

Beginning on or about the dates set forth below, in the San Angelo Division of the Northern District of Texas, and elsewhere, William Adair, Lisa Smith, Jamie King, and Clinton Johnson, defendants, did make, possess, and utter, forged and counterfeited securities of an organization, as that term is defined in Title 18, United States Code, Section 513(c)(4), with the intent to deceive another person and organization:

Count No.	Date of Offense	Name of Drawer	Name of Financial Institution	Amount of Check
22	3/23/09	Brandy Morris	Crocket National Bank	\$99.33
23	3/23/09	Brandy Morris	Crocket National Bank	\$482.60
24	3/28/09	David Adair	Crocket National Bank	\$131.96
25	3/22/09	Brandy Morris	Citizen's State Bank	\$378.89
26	3/22/09	Brandy Morris	Citizen's State Bank	\$109.00
27	3/22/09	Brandy Morris	Citizen's State Bank	\$757.93
28	3/23/09	Brandy Morris	Citizen's State Bank	\$113.22
29	3/22/09	Brandy Morris	Citizen's State Bank	\$108.49
30	3/22/09	Brandy Morris	Citizen's State Bank	\$211.59
31	3/22/09	Brandy Morris	Citizen's State Bank	\$231.10
32	3/22/09	Brandy Morris	San Angelo National	\$110.63
33	3/29/09	Lisa Smith	San Angelo National	\$345.97
34	3/31/09	Lisa Smith	Wells Fargo	\$247.64

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Count No.	Date of Offense	Name of Drawer	Name of Financial Institution	Amount of Check
35	3/31/09	Lisa Smith	Wells Fargo	\$156.17
36	3/29/09	Lisa Smith	Wells Fargo	\$479.50
37	3/30/09	Lisa Smith	Wells Fargo	\$233.80
38	3/29/09	Lisa Smith	Wells Fargo	\$327.72
39	3/29/09	Lisa Smith	Wells Fargo	\$319.62

Each count being a violation of Title 18, United States Code, Sections 513(a) and 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

Count Forty Identity Theft (Violation of 18 U.S.C. §§ 1028(a)(7), (b)(2)(A), (c)(3)(A))

From beginning on or about March 1, 2009, and continuing to on or about April 30, 2009, in the San Angelo Division of the Northern District of Texas, and elsewhere, **Jamie King**, defendant, did knowingly use and possess, without lawful authority, a means of identification of another person, to wit: Brandy Morris, with the intent to commit, and to aid and abet, and in connection with, an unlawful activity that constitutes a violation of federal law, to wit: a violation of 18 U.S.C. § 513(a), such prohibited possession and use in and affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(2)(A), 1028(c)(3)(A), and 2.

Count Forty-One Identity Theft (Violation of 18 U.S.C. §§ 1028(a)(7), (b)(2)(A), (c)(3)(A))

From beginning on or about March 1, 2009, and continuing to on or about April 30, 2009, in the San Angelo Division of the Northern District of Texas, and elsewhere, William Adair, defendant, did knowingly use and possess, without lawful authority, a means of identification of another person, to wit: David Adair, with the intent to commit, and to aid and abet, and in connection with, an unlawful activity that constitutes a violation of federal law, to wit: a violation of 18 U.S.C. § 513(a), such prohibited possession and use in and affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(7), 1028(b)(2)(A), 1028(c)(3)(A), and 2.

A TRUE BILL:

JAMES T. JACKS **UNITED STATES ATTORNEY**

ANN C. ROBERTS

Assistant United States Attorney Texas State Bar No. 24032102 1205 Texas Avenue, Suite 700

Lubbock, Texas 79401 806.472.7397 Tel: Fax: 806.472.7324

Email: ann.roberts@usdoj.gov

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS SAN ANGELO DIVISION

THE UNITED STATES OF AMERICA

v.

WILLIAM ADAIR (1) LISA SMITH (2) JAMIE KING (3) **CLINTON JOHNSON (4)**

INDICTMENT

COUNT 1:CONSPIRACY TO MANUFACTURE, POSSESS, AND UTTER **COUNTERFEIT SECURITIES** Title 18, United States Code, Section 371.

COUNTS 2-39: UTTERING FORGED AND COUNTERFEITED SECURITIES Title 18, United States Code, Section 513(a).

COUNTS 40-41: IDENTITY THEFT Title 18, United States Code, Section 1028(a)(7), (b)(2)(A), (c)(3)(A)

	(41	COUNTS)		
A true bill rendered: Lubbock		On the	Forepers	 son
Filed in open court this	/ <u> 35</u> day of _	August	,A.D. 200	09.
Warrants to Issue			Cle	rk
	UNITE	DSTATES DISTRI	CT JUDGE	/

	Case 6:09-cr-00033-C-BG D	ocument 1 Thea our 12/C	13 rage II of I4 rage D	11
	ED STATES DISTRICT COURT	Rela	ated Case Information	
Nor	THERN DISTRICT OF TEXAS	[]		
1.	Defendant Information	Indictment/Information Pending CR Case in NDTX:	Yes X No New Defendant: Yes Yes No If Yes, number:	
	Juvenile: Yes No			
	If Yes, Matter to be sealed:	R 20 from District of	· · · · · · · · · · · · · · · · · · ·	
	Yes No			
	Defendant Name William Ada	air		
	Alias Name			
	Address	i a		
			<u> </u>	
	County in which offense was commit	ted: Tom Green Count	ty	
	T T G			
2.	U.S. Attorney Information			
	ATTOM A CORD I		D // 0.40204.00	\$**
	AUSA Ann C. Roberts		Bar # 24032102	
3.	Interpreter			
	Yes No If Yes, list la	anguage and/or dialect:		
4.	Location Status			
	Arrest Date			
	Already in Federal Custody			
	X Already in State Custody - Tom	Green County Jail		
	On Pretrial Release		Ç.	
	ON BOND			
5.	U.S.C. Citations			
	Total # of Counts as to This Defenda	nt: <u>40</u> Pe	tty Misdemeanor X	Felony
	<u>Citation</u> <u>De</u>	escription of Offense Charge	<u>Count(s</u>)
18 U.S	S.C. § 371 - Conspiracy to Make,	Possess, and Utter Forged Se	ecurities 1	
18 U.S	S.C. § 513(a) - Uttering Forged	d and Counterfeited Securities	s 2-39	
18 U.S	S.C. §§1028(a)(7),(b)(2)(A),(c)(3)(A)	- Identity Theft	41	
			_	0
Date _	08/12/09	Signature of AUS	A: ann CRE	best

	Case 6:09-cr-00033-C-BG D			jeID 12
	ED STATES DISTRICT COURT	Related C	ase Information	
NO F	THERN DISTRICT OF TEXAS Defendant Information	Indictment/Information	No New Defendant:	
	Juvenile: Yes No	Pending CR Case in NDTX: Yes Search Warrant Case Number	X No If Yes, number	r:
	If Yes, Matter to be sealed:	R 20 from District of		
	Yes No			
	Defendant Name <u>Lisa Smith</u>			
	Alias Name			
	Address			
				
	County in which offense was commit	ted: Tom Green County		
2.	U.S. Attorney Information			
	AUSA Ann C. Roberts	· · · · · · · · · · · · · · · · · · ·	Bar # 24032102	
3.	Interpreter			
	Yes No If Yes, list la	anguage and/or dialect:		
4.	Location Status			
	Arrest Date			
	Already in Federal Custody X Already in State Custody - Tom On Pretrial Release	Green County Jail		
	ON BOND			
5.	U.S.C. Citations			
	Total # of Counts as to This Defenda	nt: 40 29 Petty	Misdemeanor	X Felony
	<u>Citation</u> <u>D</u>	escription of Offense Charged	<u>Co</u>	unt(s)
18 U.S	S.C. § 371 - Conspiracy to Make,	Possess, and Utter Forged Securiti	es	
18 U.S	S.C. § 513(a) - Uttering Forge	d and Counterfeited Securities	2	2-39
			<u> </u>	
Date _	08/12/09	Signature of AUSA:	ann C	Robert

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	ED STATES DISTRICT COURT	Rela	ated Case Information	
Nor	THERN DISTRICT OF TEXAS			
1.	Defendant Information	Superseding: Y Indictment/Information	Yes X No New Defendant: Yes	∟ No
1.	Detendant Information		Yes X No If Yes, number:	
	Juvenile: Yes No		100 11 110 11 100, 10010011	
	If Yes, Matter to be sealed:			
	Yes No			
	Defendant Name Jamie King			
	Alias Name			
	Address			
	County in which offer	4-4. T- C C		
	County in which offense was commit	ted: Tom Green Count	ıy	
2.	U.S. Attorney Information			
_,	cist recorney amorameton			
	AUSA Ann C. Roberts		Don # 24022102	
	AUSA Ann C. Roberts		Bar # _ 24032102	
3.	Interpreter			
	Yes No If Yes, list l	anguage and/or dialect:		
		ang and an analysis		
4.	Location Status			
4.				
	Arrest Date			
	Already in Federal Custody			
	X Already in State Custody - Tom On Pretrial Release	Green County Jail		
	On Fleural Release			
	ON BOND			
5.	U.S.C. Citations			
				•
	Total # of Counts as to This Defenda	nt: 40 Pe	tty \square Misdemeanor \boxed{X} Fe	elony
	<u>Citation</u> <u>D</u>	escription of Offense Charge	<u>d</u> <u>Count(s)</u>	
18 U.S	S.C. § 371 - Conspiracy to Make,	Possess, and Utter Forged Se	ecurities 1	
18 U.S	S.C. § 513(a) - Uttering Forge	d and Counterfeited Securities	s 2-39	
18 U.S	S.C. §§1028(a)(7),(b)(2)(A),(c)(3)(A)	- Identity Theft	40	
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			A: QUI CRO	la to
Date _	08/12/09	Signature of AUS	A. WMM (WA	WX
	Of Lat U.	Signature of AOS	···	

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	ED STATES DISTRICT COURT	Related Case Information
Nor	THERN DISTRICT OF TEXAS	
1.	Defendant Information	Superseding: Yes X No New Defendant: Yes No Indictment/Information
1.	Delendant Into mation	Pending CR Case in NDTX: Yes X No If Yes, number:
	Juvenile: Yes No	Search Warrant Case Number
	If Yes, Matter to be sealed:	R 20 from District of
	Yes No	
	Defendant Name Clinton Joh	nson
	Alias Name	
	Address	
	. 1441 000	
	County in which offense was commit	ted: Tom Green County
2.	U.S. Attorney Information	
۷.	o.s. Audincy information	
	AUSA Ann C. Roberts	Bar # _24032102
3.	Interpreter	
	Yes No If Yes, list la	
	Yes No If Yes, list la	anguage and/or dialect:
4.	Location Status	
	Arrest Date	
	Already in Federal Custody	
	X Already in State Custody - Tom	Green County Jail
	On Pretrial Release	
	ON BOND	
5.	U.S.C. Citations	
	Total # of Counts as to This Defenda	nt: Petty Misdemeanor X Felony
	<u>Citation</u> Do	escription of Offense Charged Count(s)
18115		Possess, and Utter Forged Securities 1
		-
10 U.S	S.C. § 513(a) - Uttering Forge	d and Counterfeited Securities 2-39
		(1) on the (1) Defin of
Date _	08/12/09	Signature of AUSA: